Still additionally, applicants note that claims 4, 13, 14, 16, 19, and 20 have been rejected under 35 USC §103(a) as being unpatentable over Goulding in view of Katabira U.S. Patent No. 5,601,021. Finally, applicants note that claims 12 and 18 have been rejected under 35 USC §103(a) as being unpatentable over Goulding in view of Piecha *et al.* U.S. Patent No. 3,470,816.

At the outset, and in order to understand the clear distinctions between the present invention and the prior art, applicants wish to direct the examiner's attention to claim 1 when considered in connection with Fig. 4. The inventive printing press is said to comprise means for mounting the blanket cylinders (20a and 20b) to the at least one side frame (18) such that the axes (24a and 24b) of the blanket cylinders (20a and 20b) are in spaced parallel relation. Claim 1 also calls for the mounting means to accommodate linear adjustable positioning of the blanket cylinders (20a and 20b) along spaced parallel adjustment axes (36 and 38). Still additionally, the printing press is defined by specifying that the spaced parallel adjustment axes (36 and 38) for the blanket cylinders (20a and 20b) lie in a plane generally transverse to the axes (24a and 24b) of the blanket cylinders (20a and 20b).

Clearly, claim 1 is quite straightforward and easy to understand, and it is equally clear that Goulding has no relationship whatsoever to the structure defined by claim 1 since there is nothing whatsoever corresponding to the recited mounting means. This structural feature accommodates linear adjustable positioning of the blanket cylinders along spaced parallel adjustment axes. In contrast, Goulding provides for slight adjustments of the transfer cylinders 5 by means of set screws 11 that cause a change in the position of the bearing blocks 9 in the slots 10 in which they are slidably mounted.

As is abundantly clear from Fig. 1 of Goulding, the adjustment axes of the respective set screws 11 intersect at an acute angle and most certainly the mounting means for the transfer cylinders 5 entirely fail to disclose or suggest accommodating linear adjustable positioning of the transfer cylinders 5 along spaced parallel adjustment axes.

In fact, Goulding specifically teaches that the set screws 11 permit the making of adjustments such as might be called for by increases in the thickness of the rubber blankets 12 on the transfer cylinders 5 after the offset printing has been carried on for a time (see page 2, line 114 through page 3, line 5). There is also provided a single hand lever 25 which acts through a shaft 24, a lever 23, a link 22, an arm 21, two rock shafts 20, a downwardly-

extending crank arm 19, a pin 18, a link 17, a pin 16, an outstanding arm 15, and an eccentric bushing 14 associated with each of the transfer cylinders 5 to trip or untrip the two transfer cylinders 5 simultaneously (see page 3, lines 14-36). However, Goulding nowhere discloses or suggests that this mounting means for the transfer cylinders 5 can possibly accommodate linear adjustable positioning of the transfer cylinders 5 along spaced parallel adjustment axes.

In reality, Goulding cannot possibly perform this function due to the use of the eccentric bushings and also due to the use of the set screws that are disposed on intersecting axes, not on parallel axes.

In view of the foregoing, applicants respectfully submit that independent claim 1 is patentably distinguishable over Goulding whether considered under 35 USC §102(b) or 35 USC §103(a).

In view of the foregoing, not only is independent claim 1 patentably distinguishable over Goulding but, for the same reasons, claims 2, 3, and 5-7 are also patentably distinguishable over this reference. Claims 2, 3, and 5-7 are all dependent upon independent claim 1 and, thus, include all of the limitations thereof in addition to additional features of the present invention and, thus, all of claims 1-3 and 5-7 are in condition for allowance.

With regard to independent claim 8, it closely parallels independent claim 1 while additionally calling for a pair of spaced parallel side frames rather than "at least one side frame." It likewise calls for means for mounting the blanket cylinders to the side frames such that the axes of the blanket cylinders are maintained in spaced parallel relation, and it defines the mounting means as accommodating linear adjustable positioning of each of the blanket cylinders along respective pairs of spaced parallel adjustment axes in each of the side frames. Still additionally, independent claim 8 specifies that the spaced parallel adjustment axes for the blanket cylinders are linear adjustment axes lying generally in the planes of the side frames.

In addition to these limitations, independent claim 8 calls for the mounting means to include a respective pair of linear slide assemblies in each of the side frames each of which is carried in a linear slideway so as to be axially movable. Still further, the linear slide assemblies are defined as being axially movable along the corresponding ones of the linear adjustment axes for the blanket cylinders.

As will be appreciated from the foregoing, independent claim 8 is directed to the same inventive concept although in greater detail than set forth in independent claim 1 and, for this reason, is clearly patentably distinguishable over Goulding.

With regard to claims 10 and 11, they are dependent upon independent claim 8 and set forth still additional limitations in terms of varying scope. These claims are therefore likewise patentable over Goulding for all of the reasons that have been discussed in detail hereinabove. As a result, applicants respectfully request prompt reconsideration and allowance of claims 8, 10, and 11.

With regard to independent claim 15, it sets forth a pair of linear slide assemblies in each of a pair of side frames for mounting a pair of blanket cylinders to the side frames such that the axes of the blanket cylinders are maintained in spaced parallel relation. The linear slide assemblies are each defined as being carried in a linear slideway to accommodate linear adjustable positioning of the blanket cylinders along respective pairs of spaced parallel adjustment axes. Still additionally, independent claim 15 includes at least one stop for each of the linear slide assemblies to define a preselected range of linear adjustable positioning of the blanket cylinders to vary spacing between the blanket cylinders.

Without question, Goulding is entirely deficient for the reasons discussed in connection with the other claims hereinabove. There quite simply are no spaced parallel adjustment axes in a plane generally transverse to the axes of the blanket cylinders in Goulding much less many of the other limitations of independent claim 15. As a result, applicants respectfully request prompt reconsideration and allowance of independent claim 15.

With regard to claim 17, it is dependent upon independent claim 15 and sets forth still additional details. For the reasons already discussed herein, applicants respectfully submit that dependent claim 17 is likewise patentable over Goulding.

With reference to claims 4, 13-14, 16, and 19-20, they have all been rejected under 35 USC §103(a) as being unpatentable over Goulding in view of Katabira *et al.* that has been cited as teaching "axial movement of shaft 51 which is also located in a slideway member 65" in Fig. 2. However, Fig. 2 very clearly shows this so-called "axial movement" to be movement along the axis of the blanket cylinder, not movement along spaced parallel adjustment axes which are in a plane generally transverse to the axes of the blanket cylinders.

As a result, applicants respectfully submit that all of claims 4, 13, 14, 16, 19, and 20 are fully patentably distinguishable over the combination of Goulding in view of Katabira et al.

With regard to the discussion of the joggle links 77 and 79 which are actuated by cranks in the form of cylinders 73 and 75, the examiner's position is not well taken since this movement is for an entirely different purpose. Specifically, the bearing holding members 65 and 67 move between a holding position wherein the bearing member 55 is clamped and held by the bearing holding members 65 and 67 and an unholding position wherein the holding members 65 and 67 are axially separated from one another in a horizontal direction to release the bearing member 55 for the purpose of allowing a cylindrical blanket 45 to pass in an axial direction (see column 5, lines 24-35). In other words, Katabira *et al.* entirely failed to disclose or suggest any arrangement for axially moving linear slide assemblies in each of a pair of linear slideways along corresponding ones of spaced parallel adjustment axes extending in a plane generally transverse to the axes of the blanket cylinders.

Since Katabira is deficient in this respect, applicants respectfully submit that claims 4, 13, 14, 16, 19, and 20 are all very clearly patentably distinguishable over the combination of Goulding in view of Katabira *et al*.

Finally, with regard to claims 12 and 18, the examiner has rejected these claims under 35 USC §103(a) as being unpatentable over the combination of Goulding in view of Piecha *et al.* Piecha is apparently cited as teaching a quick disconnect to change plate cylinders, but this reference clearly does nothing to remedy the deficiencies that have been thoroughly noted in connection with Goulding. As a result, applicants respectfully submit that claims 12 and 13 are very clearly patentably distinguishable over the combination of Goulding and Piecha *et al.* 

With regard to the drawings, applicants have noted the informalities that have been found objectionable and will attend to correcting those informalities when submitting the formal drawings at the time of receiving notification of allowance.

In view of all of the foregoing remarks, applicants respectfully submit that all of remaining claims 1-26 are clearly patentable over all of the art of record and, accordingly, earnestly solicit prompt reconsideration and receipt of the formal Notice of Allowance.

## Respectfully submitted,

MARSHALL, O'TOOLE, GERSTEIN, MURRAY & BORUN

6300 Sears Tower

233 South Wacker Drive

Chicago, Illinois 60606-6402

(312) 474-6300

By:

Patrick D. Ertel Reg. No. 26,877

July 22, 1998